

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE,  
NASHVILLE DIVISION**

Vimala, LLC, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
WELLS FARGO BANK, N.A., et al.,	)	No. 3:19-cv-00513
	)	JUDGE RICHARDSON
Defendants.	)	
_____	)	
	)	
	)	

**PLAINTIFFS' MOTION TO EXTEND DEADLINE TO RESPOND TO SPECIAL  
MASTER COOPER'S MOTION**

Pursuant to FRCP 6(b), Plaintiffs Vimala, LLC and Alecia Venkataraman respectfully move for an extension of time to April 12, 2023 to respond to the Special Master's Motion (Doc. No. 208).

As grounds for the continuance, undersigned counsel would state: (1) that he has been retained for the limited purpose of entering into discussions with certain of Plaintiffs' creditors, including the Special Master; (2) that it is possible that the parties will be able to reach an agreement given additional time; and (3) that if no agreement is reached Plaintiffs will respond to the motion on the same timeline as Plaintiffs' former counsel has to respond to the motion (by April 12, 2023), therefore no delay in the proceedings will occur by virtue of the additional time.

Therefore, Plaintiffs respectfully request that they be permitted until April 12, 2023 to respond to the Special Master's Motion.

Respectfully submitted,

/s/ Michael G. Abelow

Michael G. Abelow (No. 26710)

[mabelow@srvhlaw.com](mailto:mabelow@srvhlaw.com)

SHERRARD ROE VOIGT & HARBISON, PLC

150 3rd Avenue South, Suite 1100

Nashville, Tennessee 37201

Telephone: (615) 742-4200

Fax: (615) 742-4539

Counsel for Vimala, LLC and Alecia

Venkataraman<sup>1</sup>

#### **CERTIFICATE OF SERVICE**

I certify that on this day, February 28, 2023, a true and exact copy of the foregoing document has been served on the following counsel by electronic mail and/or CM/ECF to:

William W. Drinkwater, Esq.

NELSON, MULLINGS, RILEY & SCARBOROUGH, LLP

150 Fourth Ave, N, Suite 1100

Nashville, TN 37219

[woods.drinkwater@nelsonmullins.com](mailto:woods.drinkwater@nelsonmullins.com)

*Attorneys for Defendants Wells Fargo Bank, N.A. and Wells Fargo Merchant Services, LLC*

Jarrold D. Shaw

Nellie E. Hestin

MCGUIRE WOODS LLP

Tower Two-Sixty

260 Forbes Avenue, Suite 1800

Pittsburgh, PA 15222

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<sup>1</sup> As is discussed above, counsel is hereby entering a limited appearance solely for purposes of dealing with the Special Master's Motion.

Phone: (412) 667-7909

E-Mail: [nhestin@mcguirewoods.com](mailto:nhestin@mcguirewoods.com); [jshaw@mcguirewoods.com](mailto:jshaw@mcguirewoods.com)

*Attorneys for Defendants Wells Fargo Bank, N.A. and Wells Fargo Merchant Services, LLC*

Scott Cooper Pegasus Squire, Inc.

12021 Wilshire Blvd., Ste 770

Los Angeles, CA 90025-1206

[scott@pegasussquire.com](mailto:scott@pegasussquire.com)

/s/ Michael G. Abelow